

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

NANCY R., pseudonymously,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.: 5:25-cv-00462-G
	)	
PLAZA HOTELS, LLC, et al.,	)	
	)	
Defendants,	)	

**MOTION FOR ADMISSION PRO HAC VICE OF  
PATRICK BRYANT MOORE**

Defendant ESH Strategies Franchise, LLC (“Defendant”), pursuant to Western District Rule LCvR83.3, respectfully moves this Court for an order admitting Patrick Bryant Moore of the law firm of Weinberg, Wheeler, Hudgins, Gunn & Dial, to this Court *pro hac vice*, for the purposes of representing Defendant in the above-styled matter. In support of this motion, Defendant states as follows:

1. Patrick Bryant Moore is a member in good standing of the Georgia State Bar. His Request for Admission *Pro Hac Vice* is attached hereto as Exhibit “1.”
2. Patrick Bryant Moore is expected to participate in the preparation and trial of this matter for the Defendant.

Charles D. Neal, Jr., the attorney who signed the initial pleading and this motion, has been duly and regularly admitted to practice in this honorable Court. Mr. Neal has entered his appearance and will continue as counsel in this case pursuant to LCvR83.3.

WHEREFORE, Defendant ESH Strategies Franchise, LLC respectfully requests that this Court enter an order allowing the entry of appearance of Patrick Bryant Moore as counsel *pro hac vice* for Defendant for all purposes in this action.

Respectfully submitted,

**STEIDLEY & NEAL, P.L.L.C.**

s/ Charles D. Neal, Jr.  
Charles D. Neal, Jr., OBA #6591  
[cdn@steidley-neal.com](mailto:cdn@steidley-neal.com)  
Philard L. Rounds, Jr., OBA #7780  
[plr@steidley-neal.com](mailto:plr@steidley-neal.com)  
Jamie A. Rogers, OBA #19927  
[jar@steidley-neal.com](mailto:jar@steidley-neal.com)  
CityPlex Towers, 53<sup>rd</sup> Floor  
2448 East 81<sup>st</sup> Street  
Tulsa, Oklahoma 74137  
(918) 664-4612 telephone  
(918) 664-4133 facsimile  
*Counsel for ESH Strategies Franchise, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2025, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing.

Fletcher D. Handley, Jr.  
THE HANDLEY LAW CENTER  
[fdh@handleylaw.com](mailto:fdh@handleylaw.com)  
*Counsel for Plaintiff*

Michael C. Kane  
Joel Hengstler  
Bradley J. Myers  
[service@the702firm.com](mailto:service@the702firm.com)

Bart Jay Robey  
Eric A. Moen  
Abby R. Herren  
CHUBBUCK DUNCAN & ROBEY, P.C.  
[eamoen@chubbucklaw.com](mailto:eamoen@chubbucklaw.com)  
*Counsel for Defendant OKC Airport ES*  
  
Michael S. Linscott  
DOERNER, SAUNDERS, DANIEL & ANDERSON

*Counsel for Plaintiff*

Geoffrey C. Parker  
Jonathan Hilton  
[gparker@hiltonparker.com](mailto:gparker@hiltonparker.com)  
[jhilton@hiltonparker.com](mailto:jhilton@hiltonparker.com)  
*Counsel for Plaintiff*

David C. Senger  
Hunter M. Siex  
COFFEY, SENER & WOODARD PLLC  
[david@cswlawgroup.com](mailto:david@cswlawgroup.com)  
[hunter@cswlawgroup.com](mailto:hunter@cswlawgroup.com)  
*Counsel for Defendant Jaliyan  
Hospitality*

[mlinscott@dsda.com](mailto:mlinscott@dsda.com)

Kaylee Davis-Maddy  
DOERNER, SAUNDERS, DANIEL & ANDERSON  
[kmaddy@dsda.com](mailto:kmaddy@dsda.com)  
*Counsel for Super 8 Worldwide, Days Inns  
Worldwide, Ramada Worldwide, & Howard  
Johnson International*

Robert Glenn Chadwick, Jr.  
Alexander Gebert  
FREEMAN MATHIS & GARY, LLP  
[bob.chadwick@fmglaw.com](mailto:bob.chadwick@fmglaw.com)  
[alex.gebert@fmglaw.com](mailto:alex.gebert@fmglaw.com)  
*Counsel for Raj Krupa Hotel, LLC*

I hereby certify that on May 14, 2025 I filed the attached document with the  
Clerk of the Court and served the attached document by on the following, who are  
not registered participants of the ECF System:

PLAZA HOTELS, LLC  
3200 S 1-35 Service Road  
Oklahoma City, OK 73129

INDRA, LLC  
c/o Ramesh Patel  
11935 N. 1-35 Service Rd.  
Oklahoma City, OK 73131

KAJAL HOSPITALITY, LLC  
c/o Jaydip Modi  
1120 S 10<sup>th</sup> St.  
Clinton, OK 73601

NOOR HOTEL, LLC  
c/o Abdel Jawabreh  
3213 Meadow Lane

Jonathan Wilfong  
OYO HOTELS, INC.  
440 Louisiana Street, Suite 1050  
Houston, TX 77002  
*Attorney for G6 Hospitality Franchising*  
CHAND & SAAJ HOSPITALITY, INC.  
c/o Hitesh Patel  
2200 S. Meridian  
Oklahoma City, OK 73108

YASH ENTERPRISES, INC.  
c/o Tushar Natha  
400 S. Meridian  
Oklahoma City, OK 73108

OM, LLC  
c/o Ramesh V. Patel

Edmond, OK 73103

AMBICA, LLC  
c/o Prakash Patel  
5608 NW 107thSt.  
Oklahoma City, OK 73162

Michael A. Wiley  
1701 Wildhorse Dr.  
Edmond, OK 73003

12001 N I-35 Service Road  
Oklahoma City, OK 73131

Steve Keller  
5101 S. Choctaw Ave.  
El Reno, OK 73036

*s/ Charles D. Neal, Jr.*

Charles D. Neal, Jr.  
Of Steidley & Neal, P.L.L.C.